

Kathleen A. Mullins

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VIA ECF

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

The Parties are directed to contact Courtroom Deputy Christopher Davis via email by November 25, 2024 at WillisNYSDChambers@nysd.uscourts.gov to provide three mutually agreeable dates in **January, February, and March** for a pre-settlement conference and a settlement conference a week later.

The Parties request to extend the deadlines for the class certification briefing is **GRANTED**. The Parties are to provide mutually agreeable deadlines at the conclusion of the settlement conference. SO ORDERED.

JENNIFER E. WILLIS
UNITED STATES MAGISTRATE JUDGE

November 8, 2024

Re: **JOINT LETTER REGARDING SETTLEMENT CONFERENCE DATES AND CLASS CERTIFICATION BRIEFING**

Brockmole, et al. v. EZ Festivals LLC, et al.
Avchukov, et al. v. Avant Gardner, LLC, et al.
Palie, et al. v. EZ Festivals LLC, et al.
Ting, et al. v Avant Gardner LLC, et al.
Case No. 1:23-cv-08106-VM (Consolidated)

Dear Judge Willis:

Our firm represents Defendants EZ Festivals LLC, Avant Gardner LLC, Made Event LLC, Jurgen Bildstein, CityFox, Reynard Productions, and AGDP Holding, Inc. (the “EZ Defendants”) in the above four putative class action lawsuits, and we write jointly with counsel for the Plaintiffs. We write, pursuant to Your Honor’s Order of October 2, 2024 to provide proposed dates for the settlement conference, which was initially scheduled for October 8, 2024 but was adjourned by Your Honor sine die at the EZ Defendants’ request. We also write regarding the deadline for Plaintiffs’ class certification briefing.

The parties have met and conferred and are available on December 3 and 10, 2024 for the settlement conference, and for a pre-conference call with Your Honor one week earlier, i.e., November 26 or December 3, 2024, respectively.

In light of the resetting of the settlement conference date and at Defendants’ consent, the Plaintiffs request that the deadline for filing their opening brief on class certification be extended to thirty (30) days after date of the settlement conference, either January 2, 2025 or January 9, 2025, subject to the Court’s agreement of course (or 30 days after the date of the settlement conference, whenever scheduled, if neither December 3 nor December 10 is available). The Plaintiffs propose this extension because the issue of class certification may be rendered moot or limited depending on the outcome of the settlement conference. Currently, Plaintiffs’ opening brief

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is due on November 8, 2024, Defendants' opposition is due December 9, 2024, and Plaintiffs' reply brief is due December 27, 2024. Accordingly, the parties request either of the following briefing schedules depending on which date the settlement conference is set:

Plaintiffs' opening brief:	January 2, 2025
Defendants' opposition:	February 3, 2025
Plaintiffs' reply brief:	February 21, 2025

-OR-

Plaintiffs' opening brief:	January 9, 2025
Defendants' opposition:	February 10, 2025
Plaintiffs' reply brief:	February 28, 2025

Accordingly, we respectfully request that the Court schedule a settlement conference for either December 3, 2024 or December 10, 2024, and grant the Plaintiffs' request for an extension of time to file its opening class certification brief per the above proposed schedules.

Respectfully submitted,

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